



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CMM
F. #2015R01489

*610 Federal Plaza
Central Islip, New York 11722*

January 12, 2018

By FedEx and ECF

Marc Agnifilo, Esq.
Joshua Kirshner, Esq.
Brafman & Associates, P.C.
767 Third Avenue
New York, NY 10017

Re: United States v. John Venditto
Criminal Docket No. 16-540 (JMA)

Dear Counselors:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Enclosed herein are 3 CDs containing documents Bates stamped HS-SW (Emails) 1 –85986. Several of these documents contain sensitive information that is subject to the signed Protective Order and, to the extent that dates of birth, social security numbers, bank account numbers and/or other confidential information was not redacted, please be advised that such information is privileged and subject to the Protective Order. Also enclosed is an Index of the discovery. The Index is not being filed electronically. The CDs have been encrypted and password protected. The password has been provided to counsel by email.

Please be advised that the emails to/from/cc'ing employees of the Town of Oyster Bay, and attachments thereto, are, largely, duplicative of documents previously produced in the Government's May 2017 discovery production.

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time. This disclosure supplements the government's prior disclosures of December 9, 2016, March 30, 2017 and May 2, 2017, March 24, 2017, December 1, 2017 and December 28, 2017. The government also requests reciprocal discovery from the defendant.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Catherine M. Mirabile
Catherine M. Mirabile
Lara Treinis Gatz
Raymond A. Tierney
Assistant U.S. Attorneys

Enclosures

cc: Clerk of the Court (JMA) (by ECF) (without enclosures)